

Judge Jones

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of
himself and other similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the United
States, *et al.*,

Defendants.

CASE NO. C17-00094RAJ

**NOTICE OF SUBMISSION OF
FOUR DOCUMENTS FOR
IN CAMERA REVIEW AT THE
DIRECTION OF THE COURT**

TO THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON, AND TO PLAINTIFFS, AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on December 18, 2018, the Court held a telephonic status
conference with the parties to discuss, among other matters, the procedure and timing for submission
for its *in camera* review of a limited subset of documents withheld by Defendants under the
deliberative process privilege and challenged in Plaintiffs' Motion to Compel (Dkt. #152). As
reported to the Court (Dkt. # 212), the parties subsequently agreed that Defendants would submit
four documents previously shared with Plaintiffs during the parties' deliberative process privilege
negotiations for the Court's *in camera* review in relation to Dkt. #152.

NOTICE OF SUBMISSION OF FOUR DOCUMENTS FOR *IN CAMERA* REVIEW AT
THE DIRECTION OF THE COURT - 1
(Case No. C17-00094RAJ)

UNITED STATES ATTORNEY
5220 UNITED STATES COURTHOUSE
700 Stewart Street
Seattle, Washington 98101-1271
(206)-553-7970

Accordingly, the following four documents, chosen by agreement of the parties, are hereby submitted to the Court in unredacted form for *in camera* review¹:

1. DEF-00000667.unredacted.pdf
2. DEF-00011090.unredacted.pdf
3. DEF-00011100.unredacted.pdf
4. DEF-00011117.unredacted.pdf

Dated: February 5, 2019

Respectfully Submitted,

JOSEPH H. HUNT
Assistant Attorney General
Civil Division
U.S. Department of Justice

DANIEL E. BENSING
Senior Trial Counsel
Federal Programs Branch

AUGUST FLENTJE
Special Counsel
Civil Division

LEON B. TARANTO
Trial Attorney
Torts Branch

ETHAN B. KANTER
National Security Unit
Office of Immigration Litigation
Civil Division

ANDREW C. BRINKMAN
Trial Attorney
Office of Immigration Litigation

DEREK C. JULIUS
Assistant Director
Office of Immigration Litigation
Civil Division

BRENDAN T. MOORE
Trial Attorney
Office of Immigration Litigation

BRIAN T. MORAN
United States Attorney

LINDSAY M. MURPHY
Counsel for National Security
National Security Unit
Office of Immigration Litigation

s/ Brian C. Kipnis
BRIAN C. KIPNIS
Assistant United States Attorney
Western District of Washington

Counsel for Defendants

¹ By agreement of the parties, these documents were originally to be submitted to the Court on or before December 28, 2018. (Dkt. # 212). Unfortunately, the lapse of appropriations which occurred on December 22, 2018, interrupted those plans. The undersigned apologizes for the delay in submitting these documents for *in camera* review to the Court.

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Crissy Leininger
CRISSY LEININGER
Paralegal Specialist
United States Attorney's Office